

EXHIBIT A

From: Helen Chaitman
Sent: Tuesday, May 01, 2018 5:56 PM
To: 'Shifrin, Maximillian S.' <mshifrin@bakerlaw.com>
Subject: RE: Wilenitz Conference Follow-Up

When we had our meet and confer and when we exchanged emails thereafter, you never indicated that you would (and I never said that I wanted you to) limit your production to documents you obtained through 2004 subpoenas. That limitation never was discussed and I would never have agreed to that.

There is no reason to repeat the search you have already done. We had agreed that you would produce from the BLMIS data base all documents from third parties indicating trades done by Madoff and BLMIS without time limitation. I am entitled to all of those records and you should simply give me access to the BLMIS data base so that I can do my own searches. Why are you continuing to conceal these documents?

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From: Shifrin, Maximillian S. [<mailto:mshifrin@bakerlaw.com>]
Sent: Tuesday, May 01, 2018 1:35 PM
To: Helen Chaitman <hchaitman@chaitmanllp.com>
Subject: Wilenitz Conference Follow-Up

Helen,

At the hearing this morning, you appeared to object to our recent production on the grounds that it did not include documents from the BLMIS Database. As we agreed at the November 14, 2017 meet and confer, and as we confirmed in our responses and objections to your discovery requests, the Trustee applied the agreed-upon search terms across the Rule 2004 materials in the Trustee's possession.

However, we have no objection to running the same search terms across the BLMIS Database and producing any documents responsive to the search terms to the extent they have not already been made available to you. In an effort to proactively resolve this dispute, we will begin this process and provide an update once our review is complete.

If you have any questions, please feel free to reach out to me directly.

Best,
Max

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